



State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

Michael O. Leavitt
Governor

Dianne R. Nielson, Ph.D.
Executive Director

Ursula Kramer
Director

150 North 1950 West
P.O. Box 144820
Salt Lake City, Utah 84114-4820
(801) 536-4000 Voice
(801) 536-4099 Fax
(801) 536-4414 T.D.D.
Web: www.deq.state.ut.us

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To B. Ipson	From Lance Brown
Co.	Co.
Dept.	Phone # 213-367-1557
Fax # 435-864-6670	Fax #

May 2, 2000

DAQE-278-00

Lance A. Brown
Los Angeles Department of Water and Power
111 North Hope Street, Room 1050
Los Angeles, CA 90051-0100

Dear Mr. Brown:

Re: **EXPERIMENTAL APPROVAL ORDER EXTENSION TO TEST BURN PETROLEUM COKE AT THE INTERMOUNTAIN GENERATING STATION LOCATED IN MILLARD COUNTY, UTAH CDS-A, ATTAINMENT AREA, TITLE V**

Your request, dated April 12, 2000, (letter from Michael Nosanov), was received by the Utah Division of Air Quality (DAQ) on April 17, 2000. In your letter you requested an extension to the Experimental Approval Order DAQE-911-99, dated November 15, 1999, that gave approval for conducting a test burn of petroleum coke at the Intermountain Generating Station located in Millard County, Utah.

Abstract: *The Los Angeles Department of Water and Power (LADWP), operating agent for the Intermountain Power Project (IPP), has requested an extension to the Experimental Approval Order (AO), DAQE-911-99, dated November 15, 1999. Due to logistical difficulties and a scheduled five-week maintenance period IPP was not able to finish the testing. The Experimental AO allowed them to conduct trial test burns using petroleum coke (Pet Coke) and coal at the Intermountain Generating Station (IGS) located in Delta, Utah. The IGS is a coal-fired, steam-electric plant located in Millard County. Intermountain Power Service Corporation (IPSC) intends to trial burn Pet Coke with coal to determine burn characteristics and performance parameters in preparation for possible future continuous use as a supplemental fuel. If the test burns using Pet Coke are successful LADWP may submit a Notice of Intent to request approval for the burning of Pet Coke on a continuous or permanent basis as a supplemental fuel. LADWP shall submit a report describing the results of the test burns and the results of the Continuous Emission Monitoring during the test burns. The results are expected to be valuable in determining if Pet Coke can be used as a viable alternate fuel source.*

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Air Conservation Rules (UACR) and the Utah Air Conservation Act. However, air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Experimental AO by the Executive Secretary of the Utah Air Quality Board.

Approval for trial test burning of petroleum coke (Pet Coke) is hereby granted in accordance with Section 19-2-107 (2)(c) of the Utah Air Conservation Act under the following conditions:

1. Performing a trial test burn using petroleum coke (Pet Coke) shall only be performed in the main boilers at the Intermountain Generating Station located in Millard County, Utah.
2. The trial burn testing of Pet Coke shall not be performed more than 120 days from the date of this Experimental Approval Order (AO). Not more than 40,000 tons of Pet Coke shall be burned during this 120-day time period.
3. The average quantity of Pet Coke blended with coal for use during a test shall not be more than 20%.
4. This Experimental AO does not give approval to violate any conditions that limit emissions of air contaminants and/or opacity limits in the Title V Operating Permit (Permit Number 2700010001).
5. The trial burn testing of Pet Coke shall be terminated if the emissions and/or opacity limits listed in the Title V Operating Permit (Permit Number 2700010001) are exceeded and/or if the 30-day rolling average scrubber efficiency for the removal of SO_2 falls below 90%.
6. A Continuous Emissions Monitor shall measure and record the NO_x , SO_2 and opacity emissions of the main boilers during the trial burn of Pet Coke. PM_{10} emissions will be calculated using approved emission factors.

A report describing the results of the trial burn testing shall be submitted to the Executive Secretary, Utah Air Quality Board, attention New Source Review Section, within 210 days from the date of this Experimental AO. The report, at a minimum, shall include the emissions measured by the Continuous Emissions Monitors, laboratory analysis of Pet Coke characteristics, and emissions of any of the 188 Hazardous Air Pollutants listed in the 1990 Clean Air Act Amendments reasonably expected to be caused from the combustion of the Pet Coke.

The Division of Air Quality does not endorse the products, chemicals or equipment used in this Experimental AO.

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. Unless you have comments which would require additional work, the fee for this AO will be approximately \$500.00. An invoice will follow.

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If you have any questions on the Experimental Approval conditions, please contact Nando Meli at (801) 536-4052.

Sincerely,



Ursula Kramer, Executive Secretary
Utah Air Quality Board

UK:NM:re

cc: Millard County District Health Department

S. Gale Chapman
Intermountain Power Service Corporation
850 W Brush Wellman Road
Delta, Utah 84624-9546